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THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X  
RETAIL TRAVEL SERVICES, INC.,

07 CV 4617 (CM)

Plaintiff,

-against-

ANSWER TO CROSSCLAIMS  
OF BRINKS DEFENDANTS

BANK OF AMERICA, N.A., BRINKS GLOBAL  
SERVICES USA, INC. AND BRINKS, INC.,

Defendants.  
-----X

Defendant, Bank of America, N.A. hereinafter "BOA", by its attorneys, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, in answer to the crossclaims of defendants Brinks Global Services, USA, Inc. and Brinks, Incorporated, sued herein incorrectly as Brinks, Inc., (hereinafter "Brinks Defendants") alleges and answers as follows:

1. Denies the allegations contained in paragraph 64 of the Brinks Defendants' crossclaim for contribution as against BOA and BOA further again incorporates by reference as though fully set forth herein all of BOA's Affirmative Defenses to plaintiff's complaint and Crossclaims against the Brinks Defendants, all as set forth in BOA's answer filed in the within action.

2. Denies the allegations contained in paragraph 65 of the Brinks Defendants' crossclaim for indemnification as against BOA and BOA further again incorporates by reference as though fully set forth herein all of BOA's Affirmative Defenses to plaintiff's complaint and

Crossclaims against the Brinks Defendants, all as set forth in BOA's answer filed in the within action. In addition, there is no statutory or contractual basis as between BOA and the Brinks Defendants to support a cause of action for indemnification.

**WHEREFORE**, BOA respectfully requests an Order of the Court dismissing the crossclaims of the Brinks Defendants as against BOA, together with such other and further relief as to this Court may seem just and proper.

Dated: White Plains, New York  
October 5, 2007

Yours etc,

WILSON, ELSE, MOSKOWITZ,  
EDELMAN & DICKER LLP

By 

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